

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

Calvin ALPHONSE LEE, #132056

Plaintiff Case No 2:07-CV-82-MHT

vs.

ALABAMA SEPT. OF CORRECTIONS ET AL.

Defendants

← AMENDMENT TO COMPLAINT →

A 42 U.S.C. § 1983 action has been filed by the Plaintiff, who is incarcerated at FRANK LEE YOUTH CENTER, An Institution of the STATE OF ALABAMA. The Complaint was Reviewed by A UNITED STATES NAZIST-RATE JUDGE. And additional Amendment's were allowed, to be added to this Complaint at a later time. And further there after it done as according to the provision's of the Federal Rule's of Civil Procedure. And Also done, within 90 days of the date of the ORDER, 02-14-2007. The Plaintiff is not and, Attorney and has no Paralegal experience. And REQUEST'S THE COURT TO APPOINT Counsel for The Plaintiff. So that the NECESSARY Federal Rules of Civil Procedure, and The Directives contained in The COURT ORDER, are Met. Also The Plaintiff is REQUESTING the Allow him to, again Amend To The Complaint. By Submitting Sworn AFFIDAVIT'S from witnesses, whom have signed The PETITION in The Original Complaint. STATING that they are being Coerced and Threatened while being interrogated. By The Defendants here at FRANK LEE YOUTH CENTER. Also Many More Estimates have come forward, Willing to give Statement's. About The Unprofessional, and ABUSIVE Behavior of The Administrative STAFF. Here At FRANK LEE YOUTH CENTER

After all And inmates has a Constitutional And Civil Rights. To serve their imposed sentence. Without being abused by the prison staff. Under The Code of ALABAMA 1975, TITLE 14-3-13 which Deals with Solemn Oath of Officer's and Guards. Also Rule 208 of THE ADMINISTRATIVE REGULATION'S TORT'S ACTS
STANDARD of CONDUCT

#3 (2) ALL D.O.C. PERSONEL ARE expected to:

(4) EXERCISE COURTESY and Tact (7) OBSERVE Rules, Regulation's and Law's. (10) PREVENT the abuse of authority of the Badge

3(C) ALA. D.O.C. OFFICER'S ARE prohibited from (4) USING THREATS in SUPERVISING PRISONER'S and abusive Language.

THIS Administration at FRANK LEE YOUTH CENTER, has no regard for GOD'S NOR GOVERNMENT'S Law's. They secretly operate as they please covering for each other's wrong's. And should be investigated to the extreme. THIS is not an isolated incident, but a pattern of practice, that has gone on for year's. ALSO I THE PLAINTIFF REQUEST that the Court Permit, AN ALABAMA STATE EMPLOYEE, A MENTAL HEALTH TREATMENT COUNSELOR, for the STATE of ALABAMA, to testify by Sworn AFFIDAVIT. Or in Person before the Courts or the Court's INVESTIGATION AS to the Plotting of the Administrative Staff here at F.L.Y.C. CAPTAIN HORACE BORTON, SGT. VIVIAN LANGSTON, (Investigation Specialist) DEBBIE MARTIN and others. Plot to Deprive THE PLAINTIFF Colum Lee and others of his Constitutional and Civil Rights. In a heinous way, that they are devising for the future. THE PLAINTIFF REQUEST Special Permission to have the UNITED STATES DISTRICT COURT. TAKE STATEMENTS from Mrs Michele Taylor S.A.P. Counselor (334) 290-3304 at FRANK LEE YOUTH CENTER AS to the Violation named against the Defendant's in this Complaint

BEFORE THE COURT, PLAINTIFF REQUEST THAT THE COURT GRANT his REQUEST TO AMEND AGAIN TO THE COMPLAINT, ALSO REQUEST FOR AND COURT APPOINTED ATTORNEY. AND GRANT MOTION FOR LEAVE TO AMEND AND OTHER NECESSARY MOTION'S. IN ORDER THAT HE THE PLAINTIFF CAN COMPLY WITH THE DIRECTIVES OF THE COURT. IN THE PROPER MANNER. SEEING THAT THE PLAINTIFF IS WITHOUT THE LEGAL KNOWLEDGE TO CONTINUE CORRESPONDING AS REQUIRED. AND DUE TO THE FACT'S THAT THE LAW LIBRARY AT FRANK LEE IS INADEQUATE, NOT OPERABLE AS SHOULD BE. AND DUE TO THE CONSTANT HARASSMENT, AND MENTAL ANGUISH THAT THE PLAINTIFF IS SUFFERING. DUE TO INCARCERATION AND THE STRESSFUL AND ABUSIVE STYLE RENDERED TOWARDS. INMATE'S INCARCERATED AT F.L.C. PLAINTIFF PRAYS THAT THE COURT WILL GRANT THESE REQUEST AND ALLOW THIS COMPLAINT TO PROCEED FURTHER. AND ALLOW OTHER INFORMATION PERTAINING TO THE ORIGINAL COMPLAINT TO BE FILED WITH THE COURTS.

Calvin A. Lee Pro SE
 Calvin A. Lee #152056, A31-A
 PLAINTIFF

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT A COPY OF THE FOREGOING AMENDMENT TO COMPLAINT MOTION FOR LEAVE TO AMEND REQUEST FOR APPOINTED COUNSELOR HAS BEEN SERVED UPON THE CLERK OF THE COURTS WITH A COPY TO THE DEFENDANT'S ATTORNEY'S BY PLACING SAID SAME IN THE U.S. MAIL AT FRANK LEE YOUTH CENTER PROPERLY ADDRESSED AND POSTAGE PREPAID THIS THE 12TH DAY OF MARCH 2007

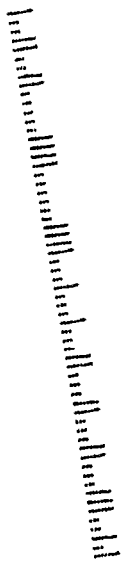
LEGAL MAIL

LEE, 153034, A31-A
LEE YOUTH CENTER
P.O. Box 36040
BIRMINGHAM AL 36032

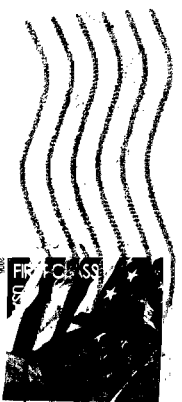
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Office of The Clerk
United States District Court
P.O. Box 711
New Teanery AL 36101-0711



LEGAL MONTGOMERY AL 361
13 MAR 2007 PM 4 T



AFFIDAVIT

STANLEY HAILEY A.I.S. 247191
(AFFEANT)

Civil Action # 2:07-CV-82-MHT

STATE OF ALABAMA

COUNTY OF ELMORE

I, STANLEY HAILEY A.I.S. 247191 has prepared this AFFIDAVIT, to testify in behalf of a Civil Action Complaint. Filed by Inmate Calvin ALPHONSE LEE A.I.S. 152056. I was assigned at FRANK LEE YOUTH CENTER as AN Inmate Law Library Clerk. From the month of OCTOBER 2006 thru FEBRUARY 24, 2007. And one of my assigned Responsibilities. Is to work according, to a schedule, prepared by SGT. VIVIAN LANGFORD. FRANK LEE YOUTH CENTER, INTELIGENTIAL Law Library SUPERVISOR. THE Inmate Law Library Clerk's job is to carry out the rules of the Library, also to keep the Library orderly and CLEAN.

THE FRANK LEE YOUTH CENTER does provide access to the Court, but only to a certain degree. Through it's VIA Lexis Nexis program. But much needed updated legal material is provided quarterly via Lexis Nexis. And all other material ^{that} is needed, because the quarterly computer update. Inmates have to wait on, And if the Law Library ^{had} some Law Books. It would be very useful to the inmates, Even A Black's Law Dictionary. This Law Library is without any, Legal Books. This is the root of Civil Action No. 2:07-CV-82-MHT. It is only Common Sense ^{is} that other Law material is needed. In a Law Library. To function effectively. And if the Courts would have this Library or send an investigator, to actually see these deficiencies

[2]

Then would the Court Comprehend, this issue more plainly. There is only one Lexis Nexis program Computer, And 20 law or more inmates, have legal reference work to be did. And there is a deadline to be met, in the courts, Frank Lee youth Center law Library is inadequate to meet the needs of these inmates. And will certainly be denying me Access to the Courts, which has been the case.

[B.] I Stanley Hooley is An Inmate Law Library Clerk, that had no qualification to work in a Law Library. But I have seen SGT. Langford Fire, the best inmates. Knowledgeable with Law, and place other inmates in the Law Library. That don't even care are in the least bit concerned, about other Legal Issues. Her Reason are not Rational. The Law Library At Frank Lee youth Center has not operated sufficiently as to opening and closing, as Required by the Standard Operating Procedures. Since I have started working here October 2006 thru February 2007. I personally come to work when I want to, and open and close when I get ready. And the other Clerk, hardly ever even show up for their duties. Paul White and Frederick Daniel L. SGT. Langford rarely Inspects the Law Library. So she is not aware of what's going on, SGT. Langford does not care. As long as no one complains she, deceives the Department's Heads or those in Authority over her. This Libraries schedule and Rules are just a disguise for the actual problems. And to also appear as if the Library is in Compliance with the State and Federal Regulations Regarding prisoners Rights to Access to the Courts. Neither Warden Cumming II or SGT. Vivian Langford, Routinely inspected the Law Library. In order to, see if there was anything needed or broken. In fact if you wanted to see SGT. Langford concerning some

LEGAL matter, or there was a need for some legal forms. It would be months before you got them, if you got them then. This seem as a way to deter inmates and the law clerk's from, coming to SGT. Langford. Requesting any documents.

[C.] The Law Library schedule is false and a misrepresentation of the Administrative Regulation's. It is not original and true. It does not consider the time taken away from it, the schedule, for the J.F. Ingram Trade school feeding time weekly. From 10:30 AM to 12:00 AM the Law Library is closed weekly. Except when Trade school is not in progress. Also the Law Library doesn't open until 12:00 daily if it's open. The Lexis Nexis computer, is not operable because the Correctional Staff. Have to be repeatedly asked to come open up the cabinet and turn the computer on. It is keep locked-up. So that is a serious problem, the majority of the morning hours. This has been repeatedly brought to, the Captain and SGT. Langford attention. But the problem has never been solved, the Morning Staff can verify that also. The evening staff, because they have had to turn it the computer on from time to time, Warden Cumming II and SGT. Langford have given false statements to the Court's. About this in Inmate's Charles Hick's A.I.S. 246241, 1983 Civil Action Complaint No. 2:06-CV-1134 MHT, Civil Action No. 2:07-CV-64-WKW. Both stated they did not deprive Inmate Hick's or other inmates to access to the Court's. And SGT. Langford statements in Hick's Civil Action Complaint. About what materials is provided is not true. Because no one has been allowed to copy anything since I've been at Frank Lee Youth Center as a Library Clerk. Also writing Instruments have NEVER been mentioned. The Institutional Contingency Fund hasn't provided any materials or services to the

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Low Library as to my knowledge, SGT. Langford is known for her ability to deceive and devise schemes for corruption.

DD WARDEN Cumming II or SGT. Langford statement's denying this should not be accepted. Because of their status, as to Pretaining to this Civil Action. But the Court, should arraign for a physical Appearance at Frank Lee Youth Center. Or send an Investigator to the prison to view the situation. And subject to the Court it's recommendations Afterward. So that these violation's can be corrected and Inmate's Rights to Access The Courts, is met.

I STANLEY HAZLEY A. L. S. 247191 MAKE these statements here in Contained in this Affidavit of my own free will and all of this information is true. I have not been coercion in anyway. I am ending my sentence of incarceration. On 02-24-07 I E.O.S. from this sentence that date. But I can be contacted at this Phone Number Area Code (205) 333-2773. Also I am in total Agreement with the 1983 Complaint that Calvin Alphense Lee, has brought against the Administration at Frank Lee Youth Center. Concerning the Low Library and treatment of Inmate's. Brought about in this Civil Action Complaint Civil Action No. 2:07-CV-82-MHT in the Middle District of ALABAMA. THE Low Library does not operate as according to the STATE OF ALABAMA DEPARTMENT OF CORRECTIONS. Administrative Regulation #24, Standard Operating Procedures E-7.

← Stanley L. Hazley →
SIGNATURE OF AFFIANT
← FRANK Lee YOUTH CENTER →
ADDRESS

(5)

Civil Action No. .
2:07-CV-82-MHT

P.O. B. 220410
 P.O. B.
 DEATSVILLE AL 36022
 City, STATE, Zip Code

SWORN TO AND SUBSCRIBED BEFORE ME THIS 23
 Day of Feb 2007.

Dwight Dick
 Notary Public

My COMMISSION EXPIRES 11/09/09

← CERTIFICATE OF SERVICE →

I Calvin A. Lee #15205, Plaintiff in the above-styled cause. Herby, Certify that I have on this date served a copy of the foregoing AFFIDAVIT on the Clerk of UNITED STATES DISTRICT COURT, for the Middle District of ALABAMA, Northern Division, Montgomery County Reference to Civil Action No. 2:07-CV-82-MHT By placing the same in the UNITED STATES MAIL, postage prepaid and properly addressed, at Frank Lee youth Center on this 2 Day of March 2007. Also a copy being sent to the Defendant's Attorney the General Counsel for the ALABAMA DEPARTMENT OF CORRECTIONS.